

## **EXHIBIT 37**

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1                   IN THE UNITED STATES COURT  
2                   NORTHERN DISTRICT OF OHIO  
3                   EASTERN DIVISION

5                   ~ ~ ~ ~ ~  
6    IN RE:    NATIONAL PRESCRIPTION    MDL NO. 2804  
7    OPIATE LITIGATION

8                   Case No. 17-mdl-2804

9  
10                  Judge Dan Aaron Polster

11    This document relates to:

12  
13    City of Cleveland, Ohio v. Purdue Pharma L.P.,  
14    et al.,

15    Case No. 1:18-OP-45132

16  
17                  ~ ~ ~ ~ ~  
18    Videotaped deposition of

19                  MICHAEL CONNELLY

20                  November 7, 2018

21                  9:05 a.m.

22                  Taken at:

23                  Zashin & Rich

24                  950 Main Avenue

25                  Cleveland, Ohio

                Wendy L. Klauss, RPR

1 Q. What are pill cases?

2 A. So prescription -- we call it  
3 diversion, so it would either be illegally  
4 obtained prescriptions.

5 Q. And how do people illegally obtain  
6 prescriptions?

7 A. They can write a fake script, they  
8 can steal grandma's prescriptions, they can go  
9 to a doctor that is writing prescriptions  
10 illegally, they can buy illegal prescriptions  
11 from a drug dealer on the corner. There is a  
12 very -- there is a variety of ways to obtain  
13 them.

14 Q. And does the compliance unit look  
15 into all of those things?

16 A. They do, you know, within their  
17 limitations, because there is only a couple of  
18 them. So if I can explain really quickly, any  
19 one of these units, if they would need help,  
20 they can ask for help from the general squad.

21 Q. How many people are in the  
22 compliance unit?

23 A. Two.

24 Q. Has that changed over time?

25 A. It's either been one or two

1       will focus on the pills. If we can make the  
2       best case from the heroin, then we will focus  
3       on the heroin.

4               If our source can only focus on one  
5       of those two, then we have to go in the  
6       direction of the source. So the sources and  
7       the cases kind of define themselves.

8               That being said -- it's difficult  
9       for me to answer your question. I'm sorry.

10          Q.        Well, let me ask you this: In the  
11       past five years, how many of your  
12       investigations -- in how many of your  
13       investigations have the pills been the driver  
14       of what you were going after, as opposed to  
15       heroin or something else?

16          A.        A small percentage. A very small  
17       percentage.

18          Q.        Where does the fentanyl and the  
19       heroin that you are investigating come from?

20          A.        The source for most of the heroin  
21       and fentanyl that we see in our Greater  
22       Cleveland area is Mexico.

23          Q.        Any other sources?

24          A.        China.

25          Q.        Have you come across any fentanyl

1       that was being a diverted prescription fentanyl  
2       product, as opposed to the bulk fentanyl coming  
3       in from China or Mexico?

4           A.       I have not.

5           Q.       If you would turn to the next page,  
6       it is actually page 4 of the application.  
7       Again, I want to actually go to the bottom.  
8       There is a -- it talks about Cuyahoga County.  
9       Do you see that at the very bottom?

10          A.       "Cuyahoga County is a heavily  
11       populated county"?

12          Q.       Yes.

13          A.       Okay.

14          Q.       And it says, "We basically have an  
15       east side task force and a west side task force  
16       that handles issues specific to their areas";  
17       do you see that?

18          A.       Yes.

19          Q.       Is that referring to just to  
20       Cuyahoga County, is it referring to your task  
21       force?

22          A.       There is other task forces that  
23       Cleveland does not participate in. So that's  
24       what they are talking about.

25                   There is an east side suburban task

1 Q. So do you agree with that sentence?

2 A. No.

3 Q. So let's unpack that a little bit,  
4 because you certainly agree with the truth of  
5 the statement that all of the law enforcement  
6 officials responding to the 2017 drug threat  
7 survey had that opinion?

8 MS. ZIMMERMANN: Objection to form.  
9 Objection. Argumentative. You may answer.

10 A. My question would be, I would like  
11 to see the question specifically that was asked  
12 to these law enforcement agencies, because  
13 that's not my opinion.

14 Q. So what is your opinion with  
15 respect to what is the greatest  
16 threat -- what's the greatest drug threat to  
17 the region?

18 A. Fentanyl.

19 Q. Fentanyl. So would you consider  
20 the heroin provided by the Mexican-based drug  
21 trafficking organizations to be the second  
22 greatest drug threat in the region?

23 A. It's right there, yeah, it's right  
24 there, just a step behind the fentanyl.

25 Q. I appreciate that clarification.